

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
FILED

**NOV 25 2019**

David J. Bradley, Clerk of Court

**UNITED STATES OF AMERICA** §

v. §

**BEVERLY DAVIS** §  
**Defendant** §

§ **CRIMINAL NO. 4:19cr 860**

**INFORMATION**

The United States Attorney charges:

At all times material to this Information:

**COUNT ONE**

**Embezzlement and Theft of Labor of Union Assets  
(29 U.S.C. § 501(c))**

1. Beginning in or about September 2010, the exact time being unknown and continuing thereafter to in or about September 2017, in the Houston Division of the Southern District of Texas and elsewhere, defendant,

**BEVERLY DAVIS,**

while an employee of Communications Workers of America Local 6222, a labor organization engaged in an industry affecting interstate commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use and to the use of another the money, funds, securities, property, and other assets of said labor

organization in the approximate amount of approximately \$85,536.77 in violation of Title 29, United States Code, Section 501(c).

**NOTICE OF FORFEITURE**

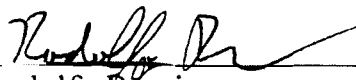
(18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c))

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice to the Defendant that upon conviction for a violation of Title 29, United States Code, Section 501(c), the United States intends to seek forfeiture of all property, real and personal, which constitutes or is derived from proceeds traceable to such offense.

**MONEY JUDGMENT AND SUBSTITUTE ASSETS**

The United States gives notice that it will seek a money judgment against the Defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of the Defendant up to the amount of the money judgment.

RYAN K. PATRICK  
United States Attorney

  
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Rodolfo Ramirez  
Assistant United States Attorney